

## Association for Environment Conscious Building

Administrative Office - PO Box 32, Llandysul  
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12/12/2003

Dear Phil,

### **Re: Comments on Draft Planning Policy Statement (PPS) 7 – Sustainable Development in Rural Areas**

Please find below our response to the draft Document, I have also included information on our organisation.

#### **Introduction**

The AECB generally supports the comments made by the sustainable land use group **Chapter 7** - in addition we would like to add a few further points.

It seems unfortunate that, as the subject of Sustainable Development in Rural Areas is stated to be so important, that the Government has not taken the opportunity to give this document statutory powers. This would also be an appropriate time to introduce the inclusion of professional advisors to planning authorities on sustainable issues, particularly as they relate to the design of buildings and landscaping.

The AECB would be willing to advise the ODPM on the impact of energy efficiency standards and 'low carbon' materials on rural design advice, to develop integrated 'sustainable' design guidance for planning departments.

#### **What vision for the Countryside**

An **ecologically**, socially and economically sustainable vision for the future of the UK countryside obviously needs to underpin all planning guidance. It is crucial to have an adequately detailed and explicit vision of what rurally based activities will lead to a genuinely sustainable and vibrant countryside. The Government seems to currently emphasise the first two of the 'three planks of sustainability' - social and economic, at

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the expense of the fundamental one underpinning a long term viable society – the environmental (i.e. ecological) aspect. Sustainability can only be achieved with these three key issues addressed in an integrated manner.

Rural areas need to be developed to encourage the sustainable production of: food; construction timber and other forest products; building materials based on renewable natural fibres (e.g. sheep's wool, hemp and flax insulations, wood fibre boards, straw boards, straw bale for contemporary building construction etc), biomass fuels and so on. There are several European examples of rurally based industries integrated with their locally grown agricultural raw materials production (e.g. crop or forestry based) including wood fibre building boards (Switzerland) to non petroleum based paint production (Germany). This includes the continuation and development of related skills through rurally based demonstration and training ventures. Several members of the AECB are running 'low carbon' building materials (import) businesses, and are attempting to develop them further in line with these integrated principles, moving some production to the (rural) UK.

The AECB is concerned that all planning guidance for development in the countryside should favour sustainable **land based** industries from the above categories, with organic food production the highest priority, followed by forestry (small and large scale) and other ecologically sustainable production / manufacturing businesses. Less emphasis should be placed on diversified rural businesses based on 'horsey culture' and tourism. These priorities should be made explicit in the guidance, and could be easily justified on social, economic and ecological grounds.

Planning guidance to ensure such a sustainable future requires flexible and prioritised responses from planning authorities, and adoption of the use of planning conditions that tie the developments to the original sustainable land use and that do not encourage land speculation and further increase land prices – which are already socially destructive and unsustainable.

### SPECIFIC CLAUSES

6. It seem sensible, as Tourism and Leisure are playing an increasing role in shaping the countryside, to make them an integral part of this Statement.

10. Given the importance of the issue, it is essential that detailed guidance on all aspects of the planning policies in PPS7 should be made available to assist in the implementation of these policies. This ensures a uniform approach among authorities and gives confidence in deliberating on such difficult and subjective areas.

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11. As affordable housing and versatile use of agricultural land play pivotal roles in the use of the countryside and are repeatedly referred to throughout the document, it is therefore necessary that they be integrated into this statement. The alternative is a fragmented, often contradictory approach.

### National Planning Policies

#### Key Principles

The document lists principles which Planning authorities should adhere to in their approach to planning and development control in rural areas. They include Sustainable Development Principles, Good Quality Development, Performance of Brownfield Sites, Good Design. These are meaningless unless supplementary guidance is given on the preferred meanings of these principles. For instance, Good Quality may be taken to mean adequate space and class of finishes; it should refer to use of non-toxic, materials, renewable energy etc. Similarly Good Design will refer to reproduction of a pseudo cottage style when it should mean appropriate design to ensure high levels of energy efficiency through adoption of fabric insulation standards compatible with the Governments' commitments of CO2 reductions, the use of passive solar design principles for optimum solar gain, (affecting orientation, building form and glazing).

#### Design and the character of rural settlements

13. planning authorities are encouraged to take a positive approach to innovative, modern designs. This should be stressed as including genuinely environmentally sensitive buildings which embody all of the above criteria and allow (where shown to be required to achieve a 'low energy / low carbon' or other environmentally low impact development) the use of solar panels, wind turbines, high levels of [south-facing] glazing, 'low carbon' materials and products, "green / habitat" roofs and other features usually considered as "inappropriate" by planning authorities. In fact, given the seriousness of the subject of Sustainability, these should be thought of as mandatory.

The advice to planning officers for developments to favour making use of existing structures through refurbishment / repair should be changed to encourage a more open minded approach in cases where a new build solution can be shown to deliver a dramatic reduction in CO2 emissions, whilst still being designed using local materials, and respecting the history and spirit of the locality.

### About us:

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**Honorary President** - Prof.Chris Baines    **Chair** -Andrew Simmonds    **Founder** - Keith Hall

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### The Association for Environment Conscious Building

The Association for Environment Conscious Building (AECB) was formed in 1989 to encourage greater environmental awareness and the adoption of environmentally responsible practices within the UK construction industry. We are an organisation with a very diverse membership that encompasses most sectors of building construction and management. Our membership of over 1500 includes, Local Authorities, Housing Associations, Design Professionals, Trades people, Construction companies, Building Materials suppliers, Students and Homeowners.

The aims of the AECB include:

- Promotion of products and materials that are safe, healthy and sustainable.
- Encouraging projects that respect, protect and enhance the environment.
- Dissemination of information and guidance about products, methods and projects.
- Support for the efforts of members in achieving these aims.

The AECB charter encourages our members towards improving environmental standards in exchange for dedicated support and promotion from the Association.

- The AECB sits on the Design Panel of the Associated Parliamentary Group for Design and Innovation based at Portcullis House
- Is working with the CITB and other regional partners on a sustainable education and training initiative for the Construction Industry
- Is working with Greenpeace / Small Woods Association / Forestry Commission on the practical solutions available for using sustainably grown timber for UK construction
- Is developing a Sustainable Energy Standard for new build domestic construction that will be consistent with the UK's commitment to reduce CO2 emissions by 60% by 2050
- Has recently advised BA on the new Terminal 5 at Heathrow

We have recently been actively involved in lobbying government on a series of issues such as the Sustainable Construction Strategy, Climate Change Programme and changes to Part L of the Building Regulations.

The AECB has been cited as the one of the most influential organisations concerned with environmental performance of construction in the construction industry. AECB

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members consistently win leading industry awards for their energy efficient and ecologically sensitive buildings.

AECB, in partnership with the Green Building Press, provides a comprehensive information and guidance service about environmentally sensitive products and sustainable construction practices. This includes a quarterly magazine (Building For a Future), a newsletter, regular workshop events, a comprehensive library, a CD Rom containing a database of material and component data (Greenpro), an annual edition of products and services directory - the Green Building Bible. Furthermore the AECB is involved in developing new resources for the industry in the form of CPD information, web sites and written information.

Yours sincerely,

**Andrew Simmonds**

Chair AECB